



JOHN ENGLER, Governor

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

*"Better Service for a Better Environment"*

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RUSSELL J. HARDING, Director

REPLY TO:

WASTE MANAGEMENT DIVISION  
PO BOX 30241  
LANSING MI 48909-7741

November 14, 2001

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Tim Burgess  
Manager of Regulatory Affairs  
Enthone-OMI Incorporated  
P.O. Box 1900  
New Haven, Connecticut 06508

Dear Mr. Burgess:

SUBJECT: Certification of Closure  
Hazardous Waste Tank and Container Storage Areas  
Enthone-OMI in Warren  
MID 056 717 747

The Michigan Department of Environmental Quality (MDEQ), Waste Management Division has completed its review of the closure certifications for the two licensed hazardous waste container storage areas, the Chemical Storage Building Waste Storage Area and the Chromic Waste Storage Area, and the interim status hazardous waste tank storage area formally located in the basement of the Administration Building at the subject facility. The certification for the hazardous waste container storage areas consists of the January 25, 2001 Closure Certification Report and the revised analytical data tables submitted on July 19, 2001. The certification for the hazardous waste tank area consists of the April 16, 1990 closure certification and the May 26, 1989 closure plan. Based on these reviews and the inspections of the closed areas conducted on August 22, 2001 and October 18, 2001, Enthone-OMI is hereby released from its closure responsibilities for the Chemical Storage Building Waste Storage Area, the Chromic Waste Storage Area, and the Hazardous Waste Tank Storage Area under Part 111, Hazardous Waste Management, of Michigan's Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and its administrative rules, MAC R 299.9101 *et seq.* Enthone-OMI is, therefore, no longer required to demonstrate financial capability for closure and liability coverage of the Facility.

Facility Status

With this acceptance of the certification of closure for the hazardous waste tank and container storage areas, the Facility can no longer be used to treat, store, or dispose of hazardous waste. All hazardous waste generated at the facility must be managed in accordance with the applicable requirements under R 299.9301 through R 299.9311.

Financial Capability

Enthone-OMI demonstrates financial assurance for closure by use of a letter of credit. In accordance with R 299.9703(5), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial assurance. The letter of credit will be returned to the issuing institution.

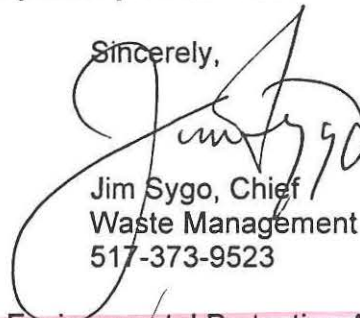
Enthone-OMI demonstrates financial responsibility for pollution liability coverage by use of a letter of credit. In accordance with R 299.9710(16), this acceptance of the certification of closure constitutes a release from the requirement to maintain such financial responsibility. The MDEQ will notify the issuing institution that the letter of credit can be terminated, and we will notify the trustee that the associated standby trust agreement be terminated.

Corrective Action

This acceptance of the certification of closure for the hazardous wastetank and container storage areas does not constitute a release from any corrective action responsibilities Enthone-OMI may have under Part 111 of Act 451 or the federal Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the Hazardous and Solid Waste Amendments of 1984. In addition to the requirement to close the regulated units at the facility, Enthone-OMI is obligated to conduct corrective action for releases of contaminants from waste management units. Enthone-OMI has conducted some investigations of the waste management units identified under their October 27, 1989 RCRA permit. Groundwater conditions and whether groundwater is not in an aquifer are unknown at this time. These issues will be addressed further under corrective action.

If you have any questions, please contact Ms. Kimberly M. Tyson of the Hazardous Waste Program Section, at 517-373-2487, or you may contact me.

Sincerely,



Jim Sygo, Chief  
Waste Management Division  
517-373-9523

cc: Ms. Harriet Croke, United States Environmental Protection Agency (U.S. EPA)  
Mr. Hak Cho, U.S. EPA  
Mr. James Reid, Conestoga-Rovers & Associates  
Mr. Larry AuBuchon/Mr. Tim Sonnenberg, MDEQ – Southeast Michigan  
Mr. Steve Buda, MDEQ  
Mr. Steve Sliver, MDEQ  
Mr. Ron Stone/Mr. Clay Spencer, MDEQ  
Ms. Kimberly M. Tyson, MDEQ  
Base File